

Christopher D. Banys (State Bar No. 230038)
Richard C. Lin (State Bar No. 209233)
cdb@banyspc.com
rcl@banyspc.com
BANYS, P.C.
2200 Geng Road, Suite 200
Palo Alto, California 94303
Telephone: (650) 308-8505
Facsimile: (650) 322-9103

Attorneys for Defendant,
POTTER VOICE TECHNOLOGIES LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

KYOCERA COMMUNICATIONS, INC.,
Plaintiff,
v.
POTTER VOICE TECHNOLOGIES LLC,
Defendant.

Case No. 13-CV-0766-H (BGS)

**DEFENDANT POTTER VOICE
TECHNOLOGIES LLC'S NOTICE OF
MOTION AND MOTION TO DISMISS
COMPLAINT FOR LACK OF PERSONAL
JURISDICTION**

Date: June 10, 2013
Time: 10:30 a.m.
Courtroom: 15A
Judge: The Honorable Marilyn L. Huff

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on June 10, 2013, at 10:30 a.m. in Courtroom 15A of the United States Courthouse Annex at 333 West Broadway, San Diego, CA 92101, Defendant Potter Voice Technologies LLC ("Potter") will, and hereby does move pursuant to Federal Rule of Civil Procedure 12(b)(2) for an order from this Court dismissing the Complaint in this action for lack of personal jurisdiction over Potter. This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the supporting declarations of Timothy M. Salmon and Richard C. Lin submitted herewith, all papers and pleadings on file in this action, such other evidence and argument as may be presented at or before any hearing on this Motion, and all matters of which the Court may take judicial notice.

Dated: April 29, 2013

Respectfully submitted,

By: /s/ Richard C. Lin
Christopher D. Banys (State Bar No. 230038)
Richard C. Lin (State Bar No. 209233)
Banys, P.C.
2200 Geng Road, Suite 200
Palo Alto, CA 94303
Tel: (650) 308-8505
Fax: (650) 322-9103
cdb@banyspc.com
rcl@banyspc.com

Attorneys for Defendant,
POTTER VOICE TECHNOLOGIES LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2013 a copy of the foregoing document was filed electronically with the Clerk of the Court using the Court's CM/ECF electronic filing system, which will send an electronic copy of this filing to all counsel of record.

/s/ Georgia Golfinopoulos
Georgia Golfinopoulos